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Attorneys for Creditor  
TROJAN CAPITAL INVESTMENTS, LLC

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re  
THOMAS J. CHEK,  
Debtor,

Case No. 18-30006

Chapter Number: 13

**SECURED CREDITOR TROJAN  
CAPITAL INVESTMENTS, LLC'S  
JOINDER TO TRUSTEE'S MOTION TO  
DISMISS CHAPTER 13 CASE**

DATE: October 17, 2018  
TIME: 1:10 p.m.  
DEPT: 17

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1 **TO THE HONORABLE COURT AND ALL PARTIES IN INTEREST:**

2 Secured creditor Trojan Capital Investments, LLC ("Trojan") hereby JOINS in the relief  
3 requested by the Chapter 13 Trustee in his *Motion to Dismiss* [Docket No. 74] (the "Motion").

4 In addition to the deficiencies identified by the trustee in the Motion, Trojan also moves  
5 for dismissal on the basis that the Debtor has made no post-petition payments on his second lien,  
6 which is held by Trojan. The Court denied the Debtor's *Motion to Value and Avoid Lien of*  
7 *Trinity Financial Services, LLC* [Docket No. 39] at the July 18, 2018 hearing in this case.  
8 However, the Debtor has yet to provide any post-petition payments on Trojan's secured lien.

9 In the event an objection to the Motion is filed, Trojan reserves the right to argue the  
10 applicable legal issues at the hearing on the Motion.

11  
12 Dated: October 8, 2018

BURKE, WILLIAMS & SORENSEN, LLP

13  
14 By: 

15 Richard J. Reynolds  
16 Rafael R. Garcia-Salgado  
17 Attorneys for Creditor  
TROJAN CAPITAL INVESTMENTS,  
18 LLC  
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**1851 East First Street, Suite 1550, Santa Ana, California 92705-4067**

**SECURED CREDITOR TRINITY FINANCIAL SERVICES, LLC'S JOINDER TO  
TRUSTEE'S MOTION TO DISMISS CHAPTER 13 CASE AND DECLARATION OF  
DON A. MADDEN, III IN SUPPORT OF TRUSTEE'S MOTION TO DISMISS  
CHAPTER 13 CASE**

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- David Burchard TESTECF@burchardtrustee.com, dburchard13@ecf.epiqsystems.com
- Rafael Ramon Garcia-Salgado rgarcia@bwsllaw.com, bantle@bwsllaw.com
- Kelsey Luu ecfcamb@aldridgepitt.com, kluu@ecf.inforuptcy.com
- Russell Marne russell@marne.com
- Office of the U.S. Trustee / SF USTPRegion17.SF.ECF@usdoj.gov
- Richard J. Reynolds rreynolds@bwsllaw.com, psoeffner@bwsllaw.com
- Neal L. Wolf nwolf@hansonbridgett.com, lchappell@hansonbridgett.com

**2. SERVED BY UNITED STATES MAIL:**

**Debtor:**

**Judge:**

☐ Service information continued  
on attached page

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1 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**  
2 **TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to

3 F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or  
4 entities by personal delivery, overnight mail service, or (for those who consented in writing to  
such service method), by facsimile transmission and/or email as follows. Listing the judge here  
constitutes a declaration that personal delivery on, or overnight mail to, the judge will be  
completed no later than 24 hours after the document is filed.

5 ☐ Service information continued  
6 on attached page

7 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
and correct.

8 **10/8/18**

Bernadette Antle

9 *Date*

*Printed Name*

  
Signature